

PROACT FACT SHEET



An Environmental Resource sponsored by HQ Air Force Center for Environmental Excellence

Cultural Resources Management

May 2000

Introduction

In response to public concern, the US Government has promulgated a number of legal requirements to ensure sound stewardship and preservation of our Nation's cultural resources. A number of these regulations encompass public lands under the management of federal agencies. Therefore, it is critical that federal agencies recognize cultural resources as being significant national assets, and take a proactive role in the identification and stewardship of cultural resources on public lands.

The Air Force is responsible for managing a variety of cultural resources present on its installations. These resources range from artifacts dating to the earliest presence of humans in North America, to buildings and relics reflecting the history and heritage of the Air Force itself. The Air Force must balance its obligation to preserve and protect these resources with the need to implement its military mission and goals.

This fact sheet provides an overview of cultural resource management (CRM) programs. It includes a discussion of the regulatory framework that governs the establishment and maintenance of CRM programs at the federal, Department of Defense (DoD), and Air Force levels. Also included are examples of successful Air Force CRM programs, a listing of additional sources of information on CRM, and points of contact for assistance with CRM program needs.

Important Terms

Note: The definitions listed here are intended only to assist readers with understanding the concepts contained in this fact sheet. Many of these terms

have specific definitions within the context of individual laws and regulations that should be consulted when resolving issues related to them.

Adverse Effect (36 CFR 800.5) - An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance, or be cumulative.

Cultural Resources - The term cultural resources is used to describe all aspects of prehistoric and historic human activities including material remains of the past, as well as beliefs, traditions, rituals, lifestyles, habits, arts, and cultures of the present.

Historic Properties - Historic properties are cultural resources and include any historic or prehistoric district, site, building, structure or object included in or eligible for inclusion in the National Register of Historic Places. The term includes artifacts, records, and remains that are related to and located on such properties.

Archeological Resources - Archeological resources can be one type of historic property and can include materials of past human life or activities that are at least 100 years of age and that are capable of providing scientific or humanistic understandings of past human behavior and cultural adaptations.

Undertaking (36 CFR 800.16) - Undertaking means a project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a federal agency, including those carried out by or on behalf of a federal agency; those carried out with federal financial assistance; those requiring a federal permit, license or approval; and

those subject to state or local regulation administered pursuant to a delegation or approval by a federal agency.

Regulatory Framework

A full accounting of the Laws, Federal Regulations, Executive Orders (EO), and DoD/Air Force Policy & Guidance Documents can be found in PROACT's "Headquarters Air Force Center for Environmental Excellence (HQ AFCEE) Environmental Quality (EQ) Resource Compact Disc (CD)," Version 10.0, August 2005.

National Historic Preservation Act of 1966 (16 U.S.C. 470)

For federal agencies, the most important regulation governing the management of cultural resources is the National Historic Preservation Act (NHPA) of 1966, 16 U.S.C. 470. The NHPA, and its amendments, establish historic preservation as a national policy and defines it as the protection, rehabilitation, restoration, and reconstruction of districts, sites, buildings, structures, and objects which are significant in American history, architecture, archeology, or engineering. The Act also expands the National Register of Historic Places (NRHP) to include resources of State and local significance, and establishes the Advisory Council on Historic Preservation (Council) as an independent federal agency. The Amendments of 1980 and 1992 direct the Secretary of the Interior to establish guidelines for nationally significant properties, curation of artifacts, documentation of historic properties, and preservation of federally-owned historic sites. They also require designation of a Federal Historic Preservation Officer (FHPO) in each federal agency; authorize the inclusion of historic preservation costs; and authorize the withholding of sensitive data on historic properties when necessary. Section 110 of the NHPA requires federal agencies to identify, evaluate, and nominate historic property under agency control to the NRHP. Section 110 also requires federal agencies to preserve and use historic buildings "to the maximum extent feasible," and to have in place Section 106 compliance procedures. Consultation with other federal, State, and local agencies, as well as Native Hawaiian/Alaskan

organizations, American Indian Tribes, and other "private individuals" regarding these activities is also required when appropriate.

Section 106 of the NHPA requires federal agencies to take into account the effects of their undertakings on historic properties, and allows the Council a reasonable opportunity to comment on proposed undertakings that could affect historic properties. It also outlines legislative requirements and review processes that federal agencies are expected to use in considering the effects of proposed undertakings on historic properties listed or eligible for listing in the NRHP. More detailed information on Section 106 is presented later in the fact sheet.

Historic Sites Act of 1935 (16 U.S.C. 461-467)

When enacted, the primary goal of the Historic Sites Act (HSA) of 1935 was to provide for the establishment and maintenance of historic sites. Furthermore, the HSA was enacted to provide for the preservation of historic buildings, sites, objects, and antiquities of national significance. It also provides a list of specific National Historic Sites. The Secretary of the Interior, through the National Park Service (NPS), has the authority to secure data relating to historic and archeological sites; make surveys of sites and buildings to determine those that are significant to the United States; acquire, reconstruct and manage historic properties; and develop educational programs to inform the public of historic and prehistoric sites. In addition, the NPS administers the National Historic Landmarks Program on behalf of the Secretary of the Interior.

National Environmental Policy Act (42 U.S.C. 4321)

The National Environmental Policy Act (NEPA) requires all federal agencies to consider the environmental impacts of their projects as part of the federal planning process. For major federal actions, federal agencies are required to prepare an Environmental Impact Statement that includes possible impacts of the project on archeological and historic properties and natural resources. The Department of the Interior, Advisory Council on Historic Preservation, and appropriate federal, State, and local agencies, may be consulted during the

process. Additional information on NEPA can be found in PROACT's The National Environmental Policy Act (NEPA) Fact Sheet is available at <http://www.afcee.brooks.af.mil/pro-act/fact/nepa.asp>

Archeological and Historic Preservation Act of 1974 (16 U.S.C. 469)

The Archeological and Historic Preservation Act (AHPA) requires preservation of significant historic and archeological data affected by any federal or federally-related land modification activity. The AHPA authorizes the expenditure of up to one percent of project costs to be allocated to archeological survey and data recovery within the project area.

Archeological Resources Protection Act of 1979 (16 U.S.C. 470aa-47011)

The Archeological Resources Protection Act (ARPA) protects archeological resources on public and Native American lands and incorporates most provisions of the Antiquities Act of 1906. The ARPA establishes a permit application procedure for the excavation and removal of archeological resources located on these lands, and provides for criminal penalties for the excavation, removal, damage, sale, exchange, purchase, or transportation of these archeological materials unless such activity is carried out under a permit issued by the authority of the Act. It also considerably strengthens preservation and archeological protection by instituting civil and criminal penalties for illegal use and destruction of resources on sites on public and Native American lands. Amendments added in 1988 strengthened the original Act by lowering the limit of felony violation of the act to \$500 worth of damage to archeological sites, and prohibiting the attempt to damage a site. These Amendments also require federal agencies to develop public awareness programs, and to improve communication and the exchange of information between all interested parties for more effective preservation efforts.

Native American Graves Protection and Repatriation Act of 1990 (25 U.S.C. 3001)

The Native American Graves Protection and Repatriation Act (NAGPRA) describes the rights of Native American lineal descendants, Indian tribes,

and Native Hawaiian organizations with regard to human remains, funerary objects, sacred objects, and objects of cultural patrimony with which they can demonstrate lineal descent or cultural affiliation. NAGPRA affirms the right of such individuals or groups to decide disposition or take possession of such items. It also requires each federal agency and museum receiving federal funding to inventory human remains and associated funerary objects, and to provide culturally affiliated tribes with the inventory and a summary of its collections of other cultural items. A tribe having cultural affiliation may request repatriation of human remains and funerary objects. NAGPRA also protects Native American burial sites and controls the removal of human remains, funerary objects, sacred objects, and items of cultural patrimony on federal and tribal lands. It also provides for criminal penalties in the event of illegal trafficking in human remains and cultural items.

Protection of Natural and Historic Features on Military Installations Act of 1993

The Protection of Natural and Historic Features on Military Installations Act (PNHFMIA) was enacted to identify and protect exceptional natural and cultural resources on closed or realigned military installations. The Act states that prior to the disposal of real property or the transfer of a facility at a military installation scheduled for realignment or closure, the Secretary of Defense must identify all areas of exceptional natural or historic character. The Act gives the Secretary of Defense authority to transfer these properties or facilities to the Secretary of the Interior or Agriculture, State or local governments, or other departments within the Department of Defense. The agency accepting the resource must agree to preserve the resource for public use.

EO 11593, "Protection and Enhancement of the Cultural Environment," 13 May 1971

Executive Order 11593 was codified as Section 110 of the NHPA in 1992, and directs federal agencies and the Secretary of the Interior to encourage and carry out preservation of federally-owned sites, structures and objects of historical, archeological, or architectural significance. Under the order, federal agencies must locate, inventory and nominate all potentially eligible sites, buildings,

districts, and objects under their jurisdiction to the NRHP. Further, federal agencies are to take proactive measures to ensure historic properties and cultural resources are not sold, transferred, or demolished, prior to accomplishing Section 106 consultations, and must provide for the preservation and maintenance of historic properties and cultural resources that they administer. The Secretary of the Interior develops criteria and procedures that federal agencies must follow in their preservation duties.

DoD Guidance

The DoD has published guidance to assist personnel in archeological and historic resource preservation. They are to be used along with applicable federal, State, and local laws and regulations for managing archeological and historic resources on DoD administered lands.

Department of Defense Instruction (DoDI) 4715.3, “**Environmental Conservation Policy**,” 3 May 1996. This Instruction establishes the policy, procedures, and responsibilities of all military personnel for the integrated management of natural and cultural resources under the jurisdiction of the DoD. The Instruction reinforces the DoD’s responsibilities to comply with federal laws and regulations, assigns specific responsibilities to department heads, and lists management procedures that mirror the federal laws and regulations for natural and cultural resources.

The DoD Legacy Resource Management Program. This program was created by Congress in 1991 under Public Law 101-511. The purpose of the program is to provide for the responsible stewardship of the over 25 million acres under DoD control as well as specified physical and paper historical records. The Legacy Program sponsors training programs, develops tools for cultural resource managers, and funds demonstration and educational projects.

Air Force Guidance

The Air Force has developed additional guidance documents to assist Air Force CRM Program

Managers with implementing the various regulatory and DoD CRM-related requirements.

Air Force Policy Directive (AFPD) 32-70, “**Environmental Quality**,” 20 July 1994. This AFPD establishes Air Force policies for achieving and maintaining environmental quality and compliance with federal environmental laws and standards. The provisions of the Policy Directive include the clean-up of damage from past activities, complying with environmental standards, and planning future activities to conserve resources and eliminate pollution. To comply with this policy directive, Air Force Historic Preservation Officers (AFHPO) and Cultural Resources Managers are to be included in environmental planning to ensure archeological and historic resources are considered.

Air Force Instruction (AFI) 32-7065, “**Cultural Resources Management**,” 13 June 1994. AFI 32-7065 provides guidelines for the protection and management of cultural resources on Air Force managed lands, and implements AFPD 32-70. The instruction encompasses all aspects of cultural resource management including compliance with federal legislation (NHPA, NAGPRA, ARPA), State, and local legislation, archeological permits, cultural resources budgeting, personnel, and training. It provides guidelines for the development of Cultural Resources Management Plans (CRMPs, discussed in more detail below), determining eligibility for nominating properties to the National Register, preparing Memoranda of Agreements, budgeting for CRM, and defining CRM training requirements.

Air Force Policy Letter, “**Air Force Guidelines of Archeological and Historical Data**,” 13 May 1992. This Air Force Policy Letter was written to inform Air Force personnel of the provisions of Title 36 Code of Federal Regulations (CFR) Part 79, “Curation of Federally-Owned and Administered Archeological Collections.” The letter describes the process Air Force installations should follow to comply with the provisions contained within the regulations as promulgated; however, it is not intended to affect collections housed as part of the

U.S. Air Force Museum Program that do not meet the inclusive definition found in Title 36 CFR 79.4.

NHPA Section 106

Section 106 Updates of 1999

A series of regulations that revise the Section 106 process went into effect on 17 June 1999, for which the Council has published a “Section 106 Regulations User’s Guide” that can be found on their website at <http://www.achp.gov>. Under these new regulations, the steps of the existing review process remain largely intact; however, the revisions incorporate statutory changes mandated by the 1992 amendments to NHPA, and streamline and clarify many of the Section 106 procedures. The major changes in the Section 106 revisions are summarized below:

- ▶ The Council will no longer review routine decisions made by Agencies and State Historic Preservation Officers (SHPO) or Tribal Historic Preservation Officers (THPO), including no adverse effect findings and most Memoranda of Agreement;
- ▶ The focus of the Council is shifted from the review of individual cases to overall program oversight and matters of national policy;
- ▶ The roles of Indian tribes and Native Americans are defined and strengthened. For actions occurring on tribal lands, the status of Indian tribes and the THPO is recognized as being equal to the SHPO for actions within the State. Specific provisions are incorporated for involving tribes when actions occur on tribal lands, and for consulting with Indian tribes and native Hawaiian organizations as required by the Section 106 process; and
- ▶ The federal agency’s exclusive role, obligation and responsibility for Section 106 review, compliance and decision making is clarified, as are the advisory roles of Council and the SHPO/THPO. The roles of the other participants and requirements for public involvement are better defined.

In addition, the revisions allow and encourage agencies to integrate Section 106 reviews with NEPA reviews. Analyses prepared for one law may be used to meet the requirements of the other. The procedures to identify and evaluate historic properties have been made more flexible to coordinate with survey and identification procedures under NEPA.

The Section 106 Process

As mentioned above, Section 106 of the National Historic Preservation Act requires federal agencies to take into account the effects of their undertakings on historic properties, and to allow the Council a reasonable opportunity to comment on any proposed undertaking that could affect historic properties. It also outlines legislative requirements and a review process that federal agencies are expected to use in considering the effects of proposed undertakings on historic properties listed or eligible for listing in the NRHP.

Step 1: Determine if the proposed action is an undertaking. The federal agency responsible for the proposed action must first determine if the proposed action has the potential to effect historic properties. However, if the proposed action does not meet the definition of an undertaking, or if the undertaking has no potential to effect historic properties, the agency has no further obligations under Section 106.

Step 2: Assess information needs. The agency must, in consultation with the SHPO/THPO, determine the scope necessary to identify and evaluate historic properties in the area of the undertaking. If historic properties have not been identified and evaluated in the area of the proposed action, then the agency is responsible for conducting additional studies to inventory cultural resources in the area. The agency should notify the SHPO/THPO of any results identifying properties that meet National Register criteria and seek “Determinations of Eligibility” for listing sites on the NRHP. If the agency has not identified any historic properties or if the proposed action does not effect any historic properties then the SHPO/THPO and any consulting parties must be notified of a

“Determination of No Effect.” If the SHPO/THPO concurs with the determination, there is no need to continue with the remaining steps and the undertaking may begin; however, if the SHPO/THPO does not concur the agency must assess adverse effects.

Step 3: *Assessing adverse effect of the undertaking on the historic properties.* A determination must be made, in consultation with the SHPO/THPO, as to whether or not the undertaking will have an “Adverse Effect” on historic properties. An adverse effect alters the characteristics of the historic property and can be cumulative. If the SHPO/THPO determines that the undertaking will have “No Adverse Effect,” then the agency may proceed with the proposed action; however, if it is assessed that the undertaking will have an “Adverse Effect” the agency must enter into consultation to mitigate any adverse effects.

Step 4: *Creation of a Memorandum of Agreement (MOA) or Programmatic Agreement (PA).* These agreements specify the mitigation plans or alternatives agreed to by the agency, the SHPO/THPO, and consulting parties. Signed MOAs and PAs acknowledge that the agency advocating the proposed action has taken into account the effects of the undertaking on the historic properties and agreed to take measures to avoid or minimize these adverse effects. Once a MOA or PA is signed, the agency may proceed with the proposed action under the terms and measures outlined in the agreement. Additional information on MOAs and PAs is presented below.

Maintenance Agreements

As mentioned above, there are two types of agreements that Air Force installations generally enter into with SHPO and Council; the MOA and the PA. These maintenance agreements are usually signed by the federal agency (i.e., the Air Force), the SHPO, and the Council. [Note: All existing MOAs and PAs are still valid under the June 1999 regulations.] An MOA is an agreement, resulting from consultation, stating measures the agency will take to avoid or reduce effects on historic properties as the undertaking is carried out. A PA is a type of MOA

that is typically developed for a large or complex project, or a class of undertakings that would otherwise require numerous individual requests for Council comments under Section 106 of the NHPA. Thus, the PA is an efficient tool by which an installation may satisfy Section 106 requirements for various projects or to address its entire Cultural Resource Management Program. Prior to entering a PA, it is helpful for federal agencies to have a Cultural Resources Management Plan (CRMP) in place. However, a PA may be created for the development and implementation of a CRMP or similar document. The following is an example of a PA:

Programmatic Memorandum of Agreement Among the United States Department of Defense, the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers, as amended

The U.S. Senate Armed Services Committee Report 97-440 to the Military Construction Authorization Bill for 1983 instructed this Programmatic Memorandum of Agreement (PA) be established to define procedures to follow before demolishing temporary World War II buildings. Under the terms of the agreement, the DoD will complete studies to establish a historical context around the construction of these buildings. Also, studies will be undertaken at individual installations to identify the installation's World War II development. Upon completion of the studies, some examples of these property types will be treated and preserved in accordance with Historic Preservation Plans developed by the DoD and approved by the Council. All other temporary buildings may be demolished without further consultation. As long as the provisions of this agreement are carried out, the DoD meets its consultation requirements with the Council on the treatment of all World War II temporary buildings.

Air Force CRM Programs

Cultural Resource Managers. As part NHPA compliance and the MOA between DoD and the National Trust for Historic Preservation, the Air

Force is required to designate a Cultural Resources Manager (or Historic Preservation Officer) for each installation. The responsibilities of Air Force Cultural Resources Managers and Historic Preservation Officers are as follows:

- Manage and maintain historic properties and cultural resources;
- Emphasize the goals of historic preservation laws and regulations;
- Regulate the disturbance of cultural resources; and
- Establish landmarks on lands, which are under their jurisdiction.

Cultural Resource Management Plan. One of the most important aspects of AFI 32-7065 is the instructions for the development of a comprehensive, installation-specific CRM Plan. The CRM Plan is intended to be an integral part of the “Base Comprehensive Plan” and is reviewed and updated annually. The CRM Plan details all historic properties and cultural resources that are listed in, or are eligible for listing in, the NRHP. In addition, the Plan outlines the installation’s policies and procedures for the protection, management, and preservation of all historic properties and cultural resources. A comprehensive CRM plan should accomplish the following:

- Designate specific responsibility for recognizing and maintaining cultural resources;
- Provide a complete inventory and evaluation of all known and potential cultural resources;
- Outline a specific strategy for maintaining cultural resources and complying with federal, State and local preservation programs and legislation, and DoD and Air Force directives;
- Outline standard operating procedures and current action plans for budgeting, tracking, and scheduling activities;
- Establish a comprehensive procedure for coordinating CRM with the installation's mission;
- Provide a detailed evaluation of mission impact on cultural resources and the resolution of adverse impact;
- Establish programs to increase public

awareness of archeological resources on Air Force lands; and

- Outline guidelines for complying with American Indian Religious Freedom Act (AIFRA) and Freedom Of Information Act (FOIA) requests.

CRM Awards

As part of its commitment to protecting and preserving our nations cultural resources, the Air Force and the Deputy Undersecretary of Defense for Environmental Security sponsor annual awards to recognize high levels of achievement in cultural resource management. Information on the criteria for these awards can be found in PROACT’s Fact Sheet *Air Force Environmental & Civil Engineering Awards*, available at <http://www.p2pays.org/ref/07/06035.htm>.

For More Information

The **Environmental Conservation and Planning Directorate**, Headquarters Air Force Center for Environmental Excellence (HQ AFCEE/EC), offers a wide variety of products and services to assist installations with their CRM needs. For more information, please contact Ms. Julia Cantrell at DSN 240-3515, julia.cantrell@brooks.af.mil, Dr. James Wilde at DSN 240-6546, james.wilde@brooks.af.mil, or visit their website at <http://www.afcee.brooks.af.mil/ec/>.

PROACT is available to respond to inquiries from eligible customers about Air Force Cultural Resources Management. Contact us at DSN 240-4240, (210) 536-4214, pro-act@brooks.af.mil, or <http://www.hqafcee.brooks.af.mil/pro-act/pro-acthome.asp>.

The National Park Service is the primary resource agency for assistance and information on cultural resource management. Information on their services, regional resource centers, technical information sources, education, training, and funding programs, as well as access to a number of surveys and databases can be found at their website at <http://www.nps.gov>.

The Cultural Resource Magazine is published by the NPS and contains articles on a wide variety of CRM issues. The magazine recently published a special issue entitled “A Challenge for the Military Mission -Preservation in the Armed Forces.” Full text articles from the magazine can be found online at <http://crm.cr.nps.gov/index.htm>.

The Advisory Council on Historic Preservation provides an on-line Users Guide to 1999 Section 106 revisions, information on the Council, the National Historic Conservation Program, and CRM training and education programs at <http://www.achp.gov>.

The **Defense Environmental Network and Information eXchange (DENIX)** has compiled a large volume of web linked information on both DoD natural and cultural resource conservation programs. The list, which is grouped into categories such as legislation, directives, publications, and programs, can be accessed at <https://www.denix.osd.mil>. This site also provides more information on the **Defense Legacy Resources Program**.

The **American Cultural Resource Association** provides information on conferences, seminars, training, and contact information for SHPOs at <http://www.acra-crm.org/index.html>. Additional information and links related to cultural resource management and historic preservation can be found at <http://archnet.asu.edu/>

Information on the **National Historic Preservation Act of 1966 (as amended)** and other pertinent legislation can be found at <http://www.cr.nps.gov/local-law/nhpa1966.htm>.

Headquarters Air Force, Environmental Programs Division (HQ USAF/ILEV), establishes policy and guidance, provides program oversight and works with the Department of Defense and the other Services to develop overall DoD cultural resources policy and program initiatives. For more information, please contact, Ms. Stephanie Stevenson at DSN 664-0551, or stephanie.stevenson@pentagon.af.mil.

Document References

1. National Historic Preservation Act (NHPA), amended 1980, 1992, 16 USC 470
2. Section 106 Revisions, June 1999 (64 FR 27043-27084, 36 CFR 800, Section 106)
3. Programmatic Memorandum of Agreement Among the United States Department of Defense, the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers, as amended
4. American Antiquities Act of 1906, 16 U.S.C. 431
5. Historic Sites, Buildings, Objects and Antiquities Act of 1935 (HSA), 16 U.S.C. 461
6. Architectural Barriers Act of 1968 (ABA) 42 U.S.C. 4151-4157
7. National Environmental Policy Act (NEPA) of 1969, 42 U.S.C. 4321
8. Archeological and Historic Preservation Act (AHPA) of 1974, 16 U.S.C. 469
9. Archeological Resources Protection Act (ARPA) of 1979, 16 U.S.C. 470aa-47011
10. Native American Graves Protection and Repatriation Act (NAGPRA) of 1990, 25 U.S.C. 3001
11. Protection of Natural and Historic Features on Military Installations Act of 1993 (PNHFMIA), Public Law 100-526 and 100-510
12. Executive Order 11593, *Protection and Enhancement of the Cultural Environment*, 13 May 1971
13. Department of Defense Instruction (DoDI) 4715.3, *Environmental Conservation Program*, 3 May 1996
14. Air Force Policy Directive (AFPD) 32-70, *Environmental Quality*, 20 July 1994
15. Air Force Policy Letter, *Air Force Guidelines of Archeological and Historical Data*, 13 May 1992
16. Air Force Instruction 32-7065, *Cultural Resources Management*, 13 June 1994
17. *Working Together: Achieving Cultural Resource Management Goals through Partnerships*, National Trust Legacy Program, 1997

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